

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

GILBERTO PEREIRA BRITO, FLORENTIN
AVILA LUCAS, and JACKY CELICOURT,
individually and on behalf of all those similarly
situated,

Plaintiffs-Petitioners,

v.

WILLIAM BARR, et al.,

Defendants-Respondents.

Case No. 19-11314-PBS

SUPPLEMENTAL DECLARATION OF SOPHIE BEIERS

I, Sophie Beiers, upon my personal knowledge, hereby submit this declaration and declare as follows:

1. I am a Data Journalist at the American Civil Liberties Union national office. Prior to my current role, I worked as Senior Data Analyst at the education non-profit, YouthTruth, a project of The Center for Effective Philanthropy. I hold a bachelor's degree in Psychology from Pitzer College and a master's degree in Quantitative Methods in Social Sciences from Columbia University.

2. In addition, Thania Sanchez PhD, Quantitative Social Scientist at the ACLU Data and Analytics department reviewed my analysis. Thania has a PhD in Political Science from Columbia University and prior to joining the ACLU she was a professor of political science at Yale University.

3. To calculate the figures set forth in paragraph 4, *infra*, I utilized the same dataset referenced in my Declaration of Sophie Beiers dated June 17, 2019 (Docket No. 20).

I narrowed the dataset to include only cases in which a bond hearing took place in Boston and Hartford between November 1, 2018 and May 7, 2019.

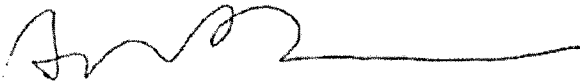
I then further narrowed the dataset to people who were eligible for bond but did not receive bond. I filtered the data to only include people who received bond hearing decisions of “no bond.” To further ensure that the dataset was limited to people who were detained, I looked for any cases that appeared in the “custody history” table as having been detained at some point.

I then further narrowed the dataset to people for whom the dataset contained a potential end date for their administrative immigration proceeding (either final proceeding date with a final order indicated, or a date of BIA appeal decision).

To estimate the length of cases for these individuals, I calculated the number of days in between one’s Notice to Appear date and either last proceeding end date (if a final order was given) or one’s last date of a BIA appeal decision if they had appealed (whichever end date came later).

4. 163 individuals fit all filter criteria specified above. The median length of their cases was 129 days; the 25th percentile was 49.5 days and the 75th percentile was 732 days.

I declare under penalty of perjury and under the laws of New York and the United States that the foregoing is true and correct to the best of my knowledge. Executed in New York, New York on August 19, 2019.

A handwritten signature in black ink, appearing to read 'Sophie Beiers', followed by a long horizontal line.

Sophie Beiers

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2019, the above-captioned document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/ Susan Finegan
Susan M. Finegan